

Matthew I. Knepper, Esq.
Nevada Bar No. 12796
Miles N. Clark, Esq.
Nevada Bar No. 13848
Shaina R. Plaksin, Esq.
Nevada Bar No. 13935
KNEPPER & CLARK LLC
5510 So. Fort Apache Rd, Suite 30
Las Vegas, NV 89148
Phone: (702) 856-7430
Fax: (702) 447-8048
Email: matthew.knepper@knepperclark.com
Email: miles.clark@knepperclark.com
Email: shaina.plaksin@knepperclark.com

David H. Krieger, Esq.
Nevada Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Ave., Suite 350
Las Vegas, NV 89123
Phone: (702) 880-5554
Fax: (702) 385-5518
Email: dkrieger@hainesandkrieger.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RICHARD DANIEL,
Plaintiff,

vs.

WELLS FARGO HOME MORTGAGE; FORD
MOTOR CREDIT COMPANY LLC; GREAT
LAKES EDUCATIONAL LOAN SERVICES
INC.; ONEMAIN FINANCIAL, INC.;
EQUIFAX INFORMATION SERVICES LLC;
and TRANS UNION LLC,
Defendants.

Case No.: 2:19-cv-00744-JCM-VCF

**JOINT MOTION TO EXTEND TIME TO
FILE STIPULATION OF DISMISSAL OF
WELLS FARGO HOME MORTGAGE
[FIRST REQUEST]**

1 Plaintiff Richard Daniel ("Plaintiff") and Defendant Wells Fargo Home Mortgage;
2 ("WFHM" or "Defendant") (collectively, the "Parties"), by and through their counsel of record,
3 hereby move jointly to extend their deadline to file a Stipulation of Dismissal of WFHM (45) forty-
4 five days:
5

6 1. The Parties settled this matter on September 9, 2019 [ECF Dkt. 50].

7 2. The Parties are currently working on finalizing their Settlement Agreement.

8 3. The Parties request and extension of forty-five days to file their Stipulation of
9 Dismissal of WFHM to allow them additional time to finalize the settlement agreement.
10


11 4. Plaintiff agrees to file the Stipulation of Dismissal of WFHM no later than
12 **December 27, 2019.**

13 DATED November 6, 2019.

KNEPPER & CLARK LLC	SNELL & WILMER LLP
<u>/s/ Shaina R. Plaksin</u>	<u>/s/ Kiah D. Beverly-Graham</u>
Matthew I. Knepper, Esq., NBN 12796 Miles N. Clark, Esq., NBN 13848 Shaina R. Plaksin, Esq., NBN 13935	Kelly H. Dove, Esq., NBN 10569 Jennifer L. McBee, Esq., NBN 9110 Kiah D. Beverly-Graham, Esq. Nevada Bar No. 11916
HAINES & KRIEGER LLC David H. Krieger, Esq., NBN 9086 <i>Counsel for Plaintiff</i>	<i>Counsel for Defendant</i> <i>Wells Fargo Home Mortgage</i>

21 **ORDER GRANTING**
22 **EXTENSION OF TIME FOR PARTIES TO FILE STIPULATION OF DISMISSAL OF**
23 **WELLS FARGO HOME MORTGAGE**

24 **IT IS SO ORDERED.**

25 
26 UNITED STATES DISTRICT COURT JUDGE

27 DATED November 7, 2019